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*Attorneys for
Turner Construction Company*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

Debtors.

Case No.: 19-30088
Case No.: 19-30089

Chapter 11

(Request for joint administration pending)

In re:

PACIFIC GAS & ELECTRIC COMPANY,

Debtors.

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE**

PLEASE TAKE NOTICE that Turner Construction Company (“Turner”), as a creditor of the Debtors’ estates, hereby requests, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017, and 9007, or pursuant to any other applicable rule or statute, that notice of all matters that which may come before the Court and all papers served or required to be served in these proceedings be given to:

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1 The foregoing request includes, without limitation, all notices, papers, pleadings, motions,
2 proposed orders, applications, petitions, plans of reorganization or liquidation, disclosure statements,
3 and any other documents or requests for relief submitted to the Court or required to be served, whether
4 formal or informal, whether written or oral, and regardless how transmitted.

5 This notice of appearance and request for special notice shall not constitute a waiver of and is
6 without prejudice to: (1) Turner's rights, remedies, claims, actions, defenses, setoffs, or recoupments, in
7 law or in equity, with respect to the above-captioned Debtors and any other entities, either in these cases
8 or in any other action, all of which rights, remedies, claims, actions, defenses, setoffs, and recoupments
9 are hereby expressly reserved; (2) Turner's right to trial by jury in any proceeding so triable;
10 (3) Turner's right to seek withdrawal of the reference of these cases or any related proceedings; and
11 (4) any objection to the jurisdiction or authority of this Court for any purpose other than with respect to
12 the notice. This notice of appearance and request for special notice shall not constitute, in any way,
13 submission to the jurisdiction of this Court for any particular issues or proceedings and shall not
14 constitute an election of remedies by Turner.

15
16 DATED: January 29, 2019

SEYFARTH SHAW LLP

17 By: /s/ M. Ryan Pinkston
18 M. Ryan Pinkston

19 *Attorneys for Turner Construction Company*